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Attorneys for Plaintiff METEJEMEI, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

METEJEMEI, LLC, an Nevada limited liability company,

Plaintiff,

vs.

MONEYTREE, INC., a Washington corporation; DOES I through X, inclusive; and ROE BUSINESS ENTITIES I through X, inclusive;

Defendant(s).

Case No. 2:21-cv-00249-JCM-VCF

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES  
(FIFTH REQUEST)**

Plaintiff METEJEMEI, LLC (“METEJEMEI”) and defendant Moneytree, Inc. (“Moneytree”) stipulate to extend the discovery deadline for an additional 30 days to complete the Rule 30(b)(6) depositions of the parties, pursuant to Fed. R. Civ. P. 26 as follows:

**I. DISCOVERY COMPLETED**

1. A Scheduling Order was issued by the Court on March 23, 2021 under ECF No. 13.

1           2.     METEJEMEI made its initial disclosures on April 1, 2021 and  
2 supplemented those disclosures on September 21, 2021.

3           3.     Moneytree made its initial disclosures on March 22, 2021.

4           4.     METEJEMEI propounded a first set of document requests to  
5 Moneytree on July 21, 2021, to which Moneytree responded on August 30, 2021.

6           5.     METEJEMEI propounded a first set of interrogatories to  
7 Moneytree on July 28, 2021, to which Plaintiff responded on August 27, 2021.

8           6.     Moneytree propounded a first set of document requests to  
9 METEJEMEI on July 30, 2021, to which METEJEMEI responded on September 7,  
10 2021.

11           7.     Moneytree propounded a first set of interrogatories to  
12 METEJEMEI on July 30, 2021, to which METEJEMEI responded on September 7,  
13 2021.

14           8.     METEJEMEI made its first supplemental disclosure on  
15 September 21, 2021 and second supplemental disclosure on November 30, 2021.

16           9.     METEJEMEI began its deposition of Moneytree's 30(b)(6)  
17 representative on November 16, 2021.

18           10.    Moneytree began its deposition of METEJEMEI's 30(b)(6)  
19 representative on January 10, 2022.

20 **II.   DISCOVERY REMAINING**

21           1.     Completion of deposition of the 30(b)(6) representative for  
22 METEJEMEI.

23           2.     Completion of deposition of the 30(b)(6) representative for  
24 Moneytree.

3. Moneytree's supplemental responses to METEJEMEI's discovery requests in light of this Court's order granting METEJEMEI's motion to compel.

### III. REASONS WHY DISCOVERY CANNOT BE COMPLETED

The parties have had difficulty completing the remaining two depositions, including the Rule 30(b)6 deposition of METEJEMEI. After the last extension the Court granted, that deposition was set for January 10, 2022. Over the weekend before that deposition, the parties' attorneys discovered an inadvertent error that led to a mutual misunderstanding concerning the topics that were the subject of that deposition notice, requiring the deposition be postponed.

Although the parties have since amicably resolved that issue, the attorneys' respective trial and hearing schedules have complicated rescheduling the deposition. Specifically, METEJEMEI's counsel had two different trials in the Eighth Judicial District Court—one this week and a second one scheduled for the entirety of next week.

### IV. CURRENT DEADLINES AND PROPOSED NEW DEADLINES

Event	Current Deadline	Proposed Deadline
Close of Discovery Deadline	January 28, 2022	<b>February 28, 2022</b>
Dispositive Motion Deadline	February 28, 2022	<b>March 30, 2022</b>
Pretrial Disclosures / Order	March 30, 2022	<b>April 29, 2022</b>

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

### V. OTHER

The parties agree that this discovery extension will be for the issues identified in Section III above only and no new discovery requests will be served

absent compelling circumstances. To the extent additional discovery is needed, the parties will meet and confer.

KAEMPFER CROWELL

BALLARD SPAHR



/s/ Joel E. Tasca

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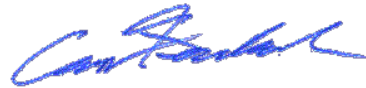
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Attorney for Defendant  
Moneytree, Inc.

Attorneys for Plaintiff  
METEJEMEI, LLC

### ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 1-24-2022